

\*\*\* Filed \*\*\*  
11:28 AM, 27 May, 2025  
U.S.D.C., Eastern District of New York

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

*Plaintiff,*

Case No.: 1:22-cv-1032 (PKC)(JRC)

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
DECLARATION OF GREGORY ELEFTERAKIS,  
ROMAN POLLAK, JONATHON D. WARNER, ESQ.  
ANTHONY BRIDDA, IME COMPANIONS LLC,  
CLIENT EXAM SERVICES LLC, and IME  
MANAGEMENT & CONSULTING LLC,

**Request For Extension On Stay**

*Defendants.*

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Dear Judge Chem,

I am writing to confirm that the \$500 payment to BRG was made on May 25, 2025, as ordered by the Court. I want to express my deepest gratitude for your understanding of the financial strain this prolonged litigation has caused my family. For the past three years, this case has been an overwhelming burden—not just financially, but emotionally and mentally as well. The plaintiff's relentless tactics have pushed my family to the brink of ruin, and I sincerely appreciate your compassion in vacating the sanctions despite the delayed payment.

I respectfully request a 60-day extension of the stay to allow me additional time to secure full legal representation. Finding an attorney willing to take on this case has been an immense struggle due to the extraordinary volume of filings (488 to date) and the complexity of the litigation. While I have had one small success—an attorney who has agreed to facilitate settlement discussions—I have yet to secure counsel for full representation. Even during the stay, I have been juggling the demands of this case alongside work and family responsibilities, which has been exhausting and unsustainable.

I want to assure the Court that my intention has always been to comply fully with its orders. If there is anything I do not understand, I will seek guidance to ensure I meet all requirements. This lawsuit has taken an extreme toll on every aspect of my life for the past three years, and I am doing everything in my power to resolve it fairly while protecting what remains of my family's stability.

Thank you, Judge Chem, for your fairness and patience throughout this ordeal. Your consideration of this request would mean a great deal to me and my family as we continue navigating this difficult process.

Respectfully,

Safa Gelardi